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September 17, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket Numbers 98N-1230; 96P-0418; and 97P-0197

To whom it may concern:

I am hereby submitting this public comment on the subject of reducing egg-borne diseases, pursuant to the above docket numbers. I believe it is incumbent upon the Food and Drug Administration to take all steps necessary to reduce egg borne diseases such as salmonella. I know that it has been scientifically proven that egg borne diseases may be increased by practices such as the forced molting of hens. This forced molting (i.e., intentional starvation of hens to manipulate egg production) destroys a hen's immune system, thereby making a hen more prone to contracting and/or passing along salmonella poisoning in her eggs. I understand that several European nations have banned forced molting because of the negative byproducts incurred thereby and the simple inhumanity of the practice. I submit that the FDA should do the same in the United States. Indeed, the Food Safety & Inspection Services has stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of *Salmonella enteritidis* (se) by laying hens subjected to these practices."

The FDA should do more to prevent egg borne diseases then simply require that egg containers carry bacteria warning labels. The FDA should prohibit, in its entirety, the practice of forced molting because the forced molting process is, in large part, the root of the problem. It should be unacceptable to the FDA to have eggs sent out into the public food stream that carry salmonella and other diseases when these diseases could be dramatically curtailed by simply forbidding forced molting practices. The health of citizens should be of the utmost interest of the FDA and should override any commercial interests exhibited by the poultry industry in this comment process.

Please do not hesitate to contact me if you have any questions about the above. Thank you for your consideration of this submission.

Very truly yours,



Marianne R. Merritt

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Docket Nos.: 98N-1230; 96P-0148; 97P-0197

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HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CROSS REFERENCE SHEET

Docket Number/Item Code: 98N-1230/C666

See Docket Number/Item Code: 97P-0197/C667
96P-0418/C666